

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

National Association of Diversity Officers in
Higher Education, et. al.,

Plaintiffs,

v.

Donald J. Trump, in his official capacity as
President of the United States,

Defendant.

Civil Action No. 1:25-cv-333-ABA

DECLARATION OF FAITH LEACH

I, Faith Leach, declare as follows:

1. I am over eighteen years old, of sound mind, and fully competent to make this declaration. I also have personal knowledge of the factual statements contained herein.

2. As I explained in my February 12, 2025 declaration in this case (ECF No. 27-26), I am the Chief Administrative Officer of the City of Baltimore, which is both a federal government contractor and grantee.

3. Since my February 12 declaration, Baltimore has suffered additional harms directly tied to the J20 and J21 Orders.

4. For example, around 11:45 ET on February 14, 2025, Baltimore received emails from AmeriCorps informing us that three of our AmeriCorps grants had been flagged for review based on the Executive Orders.

5. AmeriCorps is a federal agency that is intended to provide opportunities for Americans of all backgrounds to serve their country, address the most pressing challenges, and

improve lives and communities. To accomplish its mission, AmeriCorps administers a number of service programs including its Seniors program, its VISTA program, its National Civilian Community Corps, and more. AmeriCorps also provides grants to local and national organizations and agencies to carry out this work.

6. With respect to Grant Number 24SCBMD002—intended to support 50 AmeriCorps Seniors volunteers who provide supportive services to home-bound seniors in Baltimore—our grant was flagged because the “strengthening communities narrative” section of our application included the terms “Diversity,” “Equity,” “Equity Action Plan,” and “DEI.”

7. With respect to Grant Number 24SRBMD004—intended to support 200 AmeriCorps Seniors volunteers who participate in outreach services, distribution of community information, programs and services, and distribution of food in Baltimore communities—our grant was flagged because the “strengthening communities narrative” section of our application included the terms “Diversity,” “Equity,” and “Equity Action Plan,” and the “other narrative” section included the term “DEI.”

8. With respect to Grant Number 18VSAMD002—intended to support the Baltimore City Department of Public Work’s AmeriCorps VISTA program—our grant was flagged because several different narrative sections used the term “Environmental Justice,” one section included the term “Climate Change,” and sections about the “Baltimore DPW Education and Volunteerism VISTA” and the “DPW Education and Volunteerism VISTA,” implicated “Diversity, Equity,” and “DEI.”

9. According to AmeriCorps, the flagged language raised questions about whether Baltimore’s program “is using Federal funds to promote or provide services out of compliance of the recent Executive Orders.”


10. The letters instruct Baltimore to assess whether these three awards are compliant with executive orders by February 19, 2025.

11. According to the letters, Baltimore must take one of three courses of action before the February 19 deadline for each award: (1) Certify that the awards, using proscribed language, “compl[y] with all administration Executive Orders and do[] not include any activities that promote DEI activities”; (2) Stop providing noncompliant services by February 19, 2025; or (3) Forgo this AmeriCorps funding altogether.

12. The AmeriCorps letters only heighten Baltimore’s fear and uncertainty about whether the City must censor and chill its own expression in order to continue relying on the federal funding to carry out critical municipal responsibilities. And the agency’s lack of guidance for how to interpret the vague Executive Orders leaves the City guessing at how we can ensure we comply if we decide to censor ourselves in the first place.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed: February 18, 2025

By: 
Faith Leach
Chief Administrative Officer
City of Baltimore